



Memorandum

To Jim Christiansen, EPA Remedial Project Manager

From Jeff Montera, CDM RAC VIII Project Manager

Date April 26, 2002

Contract Number 68-W5-0022

Work Assignment Number 116RIRI-08BC

*Subject Libby Asbestos Site RI SAP and Supporting Activities
Internal Weekly Status Report*

This informal status report summarizes activities for the above referenced work assignment by CDM for the time period of April 15th through April 27th, 2002

Current Status

- Collected remaining CSS Draft SAP comments
- Prepared Interim Final
- Continued coordination efforts with Volpe/EPA removal program with regards to contaminant screening study (CSS)

Significant Conversations/Meetings

Remedial Investigation Contaminant Screening Study

- Cambridge Meeting (Libby Project 4/16 - 4/18) - The purpose of the meeting in Denver was to outline all remedial and removal actions that are to take place in Libby this season i.e., now through December 31, 2002) For remedial investigation the focused was on staffing and budget needs to ensure proper implementation of the CSS SAP Two key issues that were identified and need to be addressed before the SAP goes final are
 - 100% data validation would be cost prohibitive
 - Quality assurance samples take up a significant amount analytical budget

- Mary Goldade (CSS 4/22) – Discussed adding two new QC roles to the CSS. The first role would be a CDM person who would oversee all of the QA/QC for the CSS. This person would perform a global check of the QC program, and from this be able to identify problems and implement corrective actions.

The second role would be an independent firm, paid for by EPA, who would perform a series of field audits during the CSS.

- Dave Knight (CSS 4/22) – Requested database query of
 - What is the relationship between samples that were identified as having visible vermiculite and the LAA concentrations in those samples?

The results of that query were as follows:

- Tremolite/Actinolite was found in 74.9% of samples that were noted by field sampling personnel as having visible vermiculite.
- Mary Goldade/Dee Warren/Krista Lippoldt (CSS 4/23) – Had a meeting to discuss the following issues:
 - Mary's comments on IR and SEM validation SOPs.

The discussion focused on concerns regarding when data was rejected (i.e., R qualified). Everyone agreed that until the first data packages were received, it is difficult to estimate the appropriate acceptance criteria. The resolution was to meet again after receiving the first data packages, and decide at that point, what the appropriate acceptance criteria would be, and modify the validation SOPs.
 - Mary's comments on the CSS SAP text.

Mary clarified some of her written comments, which were later incorporated into the SAP.
 - Risk Assessment Meeting (CSS 4/23) – Scheduled meeting with Jim Christiansen, Mary Goldade, Chris Weis, Bill Bratton, and Aubry Miller for Tuesday April 30 at 9:00 in the EPA Conference Center. The topic of the meeting will be to discuss the Interim Final and how it relates to current and future risk assessment work at the site.
 - Aerial Photography (4/24) Spoke with Anni Autio and Darren Mackiewicz regarding estimate options for aerial photography at the site. They both agreed the following options were appropriate for our needs:

Libby Weekly Status Report

April 20 and 27, 2002

Page 3

- Town of Libby - Option 2 0.5 pixel, 1.2 horizontal accuracy 1:100 scale color not needed
- Surrounding Area - Option 5 1 pixel, 2.5 horizontal accuracy 1:100 scale, color not needed

Later conversations with the aerial photography contractor indicate that we can have the entire area flown, and purchase only the sections that we need

- Chris Weis/Dee Warren (CSS 4/24) Discussed Chris's comments on the CSS SAP. He reiterated the need for the two new QA/QC positions. He would also like to see the SOPs re-written to be more project specific. Currently, we use CDM's standard technical operation procedure and make project specific modification where necessary. Chris feels that re-writing along with a new comment period is necessary.

I spoke with Mary Goldade later that day about the issue. She feels that our project specific modifications will suffice, as long as we indicate in the SOPs where project specific modifications are necessary.

- Dave Knight/Terry Keller (CSS 4/25) Met with Dave and Terry regarding the development of a sampling tracking system that will be able to handle the volume of samples generated this year. The goal is to have a system in place and ready for testing by May 8th.

Field Effort

- Dave Schroeder, and Dee Warren will travel to Libby on Monday April 29th.

Laboratory

- Mary Goldade/Anni Autio (PE Samples 4/23) Both called me following the laboratory conference call on 4/23. EMSL is having a problem analyzing the current PE samples. The algorithm they developed to analyze Libby soils is designed for a heterogeneous matrix. The PE samples from USGS are too homogeneous, which results in EMSL having to use a different algorithm. Thus, the algorithm being tested is not the same algorithm that would be used to analyze soil samples during the CSS.

Later in the week (4/25), Mary informed me that USGS is preparing new PE standards using Libby soil with both a homogeneous and heterogeneous matrix, so that both algorithms can be tested. These new PE standards should be to EMSL by next week.

Community Involvement

- Karen Ekstrom (CSS 4/24) Received draft versions of hangtags and flyers for CSS investigation Made edits and sent back to Karen All flyers hangtags and booklets have been created and are waiting revisions/approval

Potential Problems and Solutions

Potential Problem	Solution
<ul style="list-style-type: none"> ■ Currently, 100% data validation is required in the CSS SAP This amount of validation is cost prohibitive ■ QC samples account for > 50% of sample analysis cost ■ EMSL unable to analyze PE sample with the same algorithm they would use on CSS soil samples ■ Chris Weis would like to see CDM re-write SOPs This would take a substantial effort 	<ul style="list-style-type: none"> ■ Do 100% data validation for the first week Reduce the amount of validation to 10% for the remaining weeks ■ Reduce the number of IR/SEM split samples to 5% versus the current procedures ■ USGS developing new PE sampling with a clean Libby soil matrix ■ Continue to use our project specific modifications, but indicate in the original text where those modifications apply

Issues Resolved

- None this period

Planned Activities/Scheduled Milestones

- ✓ 4/1 - 4/5 Onsite manager in Denver to finalize draft CSS SAP
- ✓ 4/5 Send out draft CSS SAP for stakeholder review
- ✓ 4/8 - 4/12 Stakeholder review
- ✓ 4/15 - 4/26 CDM incorporate stakeholder comments, prepare Interim Final
- ✓ 4/17 - 4/18 Field planning meeting with CDM and Volpe in Cambridge
- ✓ Mid April Prepare community involvement materials

Libby Weekly Status Report
April 20 and 27, 2002
Page 5

- 4/30 - Meeting with toxicologists/risk assessors to ensure good coordination between SAP and current and future risk assessment at the site Required before SAP can go final
- Week of 4/29 - Meet with Volpe to discuss CSS specific changes that need to be added to the database
- Week of 4/29 - Meet with data validators to discuss details (schedule, tracking, etc) with the CSS data validation
- Week of 4/29 - Final SAP
- 5/8 - Finalize sample data tracking system
- Early May - Finalize community involvement materials
- Mid May - Mobilize in field